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	MICHAEL CROSS		NEW JERSEY AS A CIVIL TRIAL ATTORNEY	
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<u>VIA ECF</u>

Honorable James B. Clark III
United States Magistrate Judge
Martin Luther King Federal Building
50 Walnut Street
Newark, NJ 07102

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RE: *Hu, et al. v. BMW of North America, LLC, et al.*
      <u>Civil Action No. 18-4363(KM)(JBC)</u>

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Dear Judge Clarkl:

We are co-counsel for Plaintiffs in the above-captioned matter. Please find enclosed my Declaration and the Declarations of Shelby R. Smith and Peter A. Shaeffer in support of Ms Smith and Mr. Shaeffer's application for *pro hac vice* admission in the above matter. Defendants have consented to this application. If the papers meet with the Court's approval, kindly sign the enclosed proposed Order and have a "filed" copy returned to us via the Court's ECF system.

Thank you for your attention to this matter. If the Court has any questions, we are available at your convenience.

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Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Lindsey H. Taylor

LINDSEY H. TAYLOR

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cc: All Counsel of Record (via ECF)